



July 16, 2004

Reply to Attn of:

GG

TO: Distribution

FROM: G/Alternate Designated Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance at Events Related to the
Farnborough International Air Show, July 18-21, 2004

Representatives from NASA have been invited to attend a series of events in conjunction with the Farnborough International Air Show. I have determined it to be in the best interest of the Government for those NASA employees who are invited to these events to attend in their official capacities and as representatives of NASA. The events are as follows:

1. Farnborough International Air Show – July 19-25, 2004 – The British National Space Center has offered to sponsor some of the admission fees for the Air Show. Approximately 200-300,000 people are expected to attend. The maximum benefit per employee would be approximately \$115. The Air Show brings many different groups together, including foreign and domestic government and industry representatives.

2. AIA VIP/President's Representative dinner- July 18, 2004- The Aerospace Industries Association is sponsoring a dinner at the Churchill Hotel in London as part of this official US Embassy event. Approximately 130-150 people are expected to attend. The maximum benefit would be \$150 per person. The dinner attendees would include the Chargé d'Affaires of the U.S. Embassy and representatives from other U.S. government agencies and industry.

3. U.S. Industry Gold Room VIP Reception- July 20, 2004- The Chargé d'Affaires of the U.S. Embassy in London is hosting this reception at the U.S. Embassy. It is sponsored by ten aerospace companies, including BAE Systems North America, The Boeing Company, DRS Technologies, EDO Corporation, General Atomics Aeronautical System, Inc., Honeywell, Lockheed Martin Corporation, Pratt & Whitney Military Engines, Raytheon Company, and Northrop Grumman Corporation. Approximately 100 people are expected to attend. The maximum benefit would be \$20 per person. The reception attendees would include the Chargé d'Affaires of the U.S. Embassy and representatives from other U.S. government agencies and industry

4. U.S. Industry Reception- July 20, 2004- This is a companion reception to the U.S. Industry Gold Room VIP Reception and is hosted and sponsored by the same parties. Approximately 600-700 people are expected to attend. The maximum benefit would be \$40

per person. The reception attendees would include the Chargé d'Affaires of the U.S. Embassy and representatives from other U.S. government agencies and industry

5. Farnborough International dinner- July 20, 2004- The sponsor of the Air Show, the Society of British Aerospace Companies (SBAC), is sponsoring dinner at the Grosvenor House in London. Approximately 1000 people are expected to attend. The maximum benefit would be \$240 per person. The attendees would include foreign and domestic government and industry representatives.

6. VIP Lunch- July 21, 2004- SBAC is sponsoring this luncheon at the Presidential Pavilion at the Air Show. Approximately 200 people are expected to attend. The maximum benefit would be between \$40 and \$70 per person. The attendees would include foreign and domestic government and industry representatives.

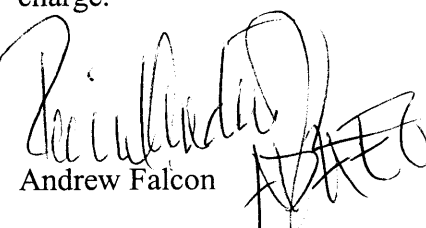
7. QinetiQ Lunch- July 21, 2004- SBAC is sponsoring this luncheon at the QinetiQ Pavilion at the Air Show. Approximately 200 people are expected to attend. The maximum benefit would be between \$40 and \$70 per person. The attendees would include foreign and domestic government and industry representatives.

8. Space Foundation VIP dinner- July 21, 2004- The Space Foundation, Northrop Grumman, and Lockheed Martin are sponsoring this dinner at the Strand Hotel in London. Approximately 40 people are expected to attend. The maximum benefit would be \$106. The attendees would include foreign and domestic government and industry representatives.

9. Team JSF (Joint Strike Fighter) Reception- July 20, 2004- This reception at the Cabinet War Rooms in London is sponsored by Lockheed Martin, Northrop Grumman, BAE Systems, Pratt & Whitney, GE Aircraft Engines, and Rolls Royce. Approximately 100-150 people are invited to attend. The maximum benefit for the admission fee and food would be \$94.50. The attendees would include foreign and domestic government and industry representatives.

I find that these events meet the requirements of a widely attended gatherings as defined in 5 CFR 635.204(g). Because of NASA's interest in international collaboration and in the advancement and application of flight and related technologies, I conclude that NASA's interest in its employees attending these events outweighs any concerns that acceptance of the gifts may appear to improperly influence the NASA personnel in the performance of their official duties.

Accordingly, NASA invitees and their spouses or guests may attend these events without charge.


Andrew Falcon